

Exhibit B

From: Hafenbrack, Joshua

Sent: Sunday, December 31, 2017 5:06 PM

To: 'Miller, Britt M.'

Cc: Ryan, Mark ; Aundrea Gulley ; Michael P. A. Cohen ; Gregor, Jennifer ; Umberger, Michelle M. (Perkins Coie) ; Provance, Matthew D. ; Nemelka, Michael N. ; Patrick, Kathy (EXTERNAL CONTACT) ; 'Brian Ross'

Subject: RE: Deposition Witnesses for Weeks of 1/15 and 1/22

Britt,

Thank you for your email. We have the following responses:

- We plan to represent Authenticom's former employees, and so you should not contact them directly. We will let you know if that changes on a person-by-person basis.
- As for Lucas Hembd and Stephanie Vue, we will agree to add them to our custodian list if you agree to add Brian McDonald and Mark Roman. We will produce them on back-to-back days the week of January 22nd – and therefore not require two separate trips in different weeks – because that will be more efficient for everyone.
- As to your proposed deposition dates for CDK/Reynolds employees, we agree to your proposal for the week of January 15 (Beth Ayotte on 1/18 and Kelly Hall on 1/19) and the week of January 22 (Mike Noser 1/23 and Ed Thornhill 1/24 or 1/26).
- Beginning the week of January 29, we will need a more efficient schedule of more than one deposition per defendant per week in order to meet the expert report deadline. Your schedule requires weekly trips to Chicago and Houston for a single deposition – which is an unnecessarily inefficient and costly approach. We are happy to discuss a more condensed timeframe and remain willing to work with you on scheduling specific witnesses for specific dates to accommodate their schedules.

I hope everyone has a happy New Year.

Regards, Josh.

From: Miller, Britt M. [<mailto:BMiller@mayerbrown.com>]

Sent: Friday, December 22, 2017 4:06 PM

To: Hafenbrack, Joshua <jhafenbrack@kellogghansen.com>

Cc: Ryan, Mark <MRyan@mayerbrown.com>; Aundrea Gulley <agulley@gibbsbruns.com>; Michael P. A. Cohen <MCohen@sheppardmullin.com>; Gregor, Jennifer <JGregor@gklaw.com>; Umberger, Michelle M. (Perkins Coie) <MUmberger@perkinscoie.com>; Provance, Matthew D. <MProvance@mayerbrown.com>; Nemelka, Michael N. <mnemelka@kellogghansen.com>; Patrick, Kathy (EXTERNAL CONTACT) <kpatrick@gibbsbruns.com>; 'Brian Ross' <bross@gibbsbruns.com>

Subject: RE: Deposition Witnesses for Weeks of 1/15 and 1/22

Josh –

Per our email exchange, below are the available deposition dates for the ten defense witnesses Authenticom has identified it intends to depose. Given the short notice and Authenticom's request that each defendant endeavor to keep the depositions in the order identified in your December 13 Letter (a request both CDK and Reynolds (with one exception) has been able to honor), we have limited flexibility with respect to dates and are thus hopeful that the below will work for your team (where we have provided alternative dates, please let us know your preference). Where currently

known, we have indicated the location where the deposition will take place (as not all of the individuals are located in Chicago or Houston). For those that we do not yet have location information for, we will update you as soon as we have additional information.

CDK Employees/Former Employees

Beth Ayotte – January 18, 2018 – Mayer Brown, Chicago

Mike Noser – January 23, 2018 – Mayer Brown, Chicago

Kevin Distelhorst – January 30, 2018 – TBD (most likely Mayer Brown, Chicago)

Ron Frey – February 9, 2018 – TBD

Leigh Ann Conver – February 15, 2018 – Mayer Brown, Washington, DC

Steve Anenen – February 22, 2018 – Mayer Brown, Chicago

Reynolds Employees (subject to the applicable search terms being finalized per the parties' agreement)

Kelly Hall – January 19, 2018 – Gibbs Bruns, Houston

Ed Thornhill – either January 24 or January 26, 2018 – Gibbs Bruns, Houston

Michael Hahn – either February 1 or February 2, 2018 - Gibbs Bruns, Houston

Jon Martin – either February 7 or February 8, 2018 - Gibbs Bruns, Houston

With respect to the Authenticom witnesses that we would like to depose during the weeks of January 15 and January 22, we would request that Authenticom produce Lucas Hembd and Stephanie Vue for deposition, in that order (we note that both of these individuals are the subject of outstanding custodian requests (see Matt's and Brian's December 19 Letters) but also note that without their addition, Authenticom will have included no one from its Dealer Services Group in its custodian pool). Going forward, and so that we can promptly identify the other three Authenticom witnesses we intend to take in the short term, we would appreciate it if you would identify which of the following former Authenticom employees are/will be represented by Kellogg Hansen and/or are within Authenticom's control for purposes of deposition so that we know whether to coordinate scheduling with you or reach out to them directly.

1. Bryan Anderson
2. Dee Dee Browning
3. Russell Gentry
4. Sarah Graf
5. Russell Grant
6. Kevin Kilgore
7. Noah La Liberte
8. Katherine "Kay" Mohs
9. Travis Robinson

Please let us know if you have any questions/wish to discuss further.

Regards – Britt

Britt M. Miller

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From: Miller, Britt M.

Sent: Thursday, December 21, 2017 2:25 PM

To: Hafenbrack, Joshua; 'Brian Ross'

Cc: Ryan, Mark; Aundrea Gulley; Michael P. A. Cohen; Gregor, Jennifer; Umberger, Michelle M. (Perkins Coie); Provance, Matthew D.; Nemelka, Michael N.

Subject: RE: Deposition Witnesses for Weeks of 1/15 and 1/22

Josh –

That shouldn't be a problem. We'll be in touch.

- Britt

Britt M. Miller

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From: Hafenbrack, Joshua [<mailto:jhafenbrack@kelloggghansen.com>]

Sent: Thursday, December 21, 2017 11:52 AM

To: 'Brian Ross'; Miller, Britt M.

Cc: Ryan, Mark; Aundrea Gulley; Michael P. A. Cohen; Gregor, Jennifer; Umberger, Michelle M. (Perkins Coie); Provance, Matthew D.; Nemelka, Michael N.

Subject: Deposition Witnesses for Weeks of 1/15 and 1/22

Brian and Britt,

Could you let us know by tomorrow: (1) what Authenticom witnesses Defendants would like to depose the weeks of January 15 and January 22; and (2) what CDK/Reynolds witnesses you plan to offer up for those weeks?

It would be much appreciated. The lead time is important, so that we can timely produce all the relevant documents (for the Authenticom witnesses) and have adequate time to prepare for the depositions.

Thanks, Josh.

Joshua Hafenbrack

Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.

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